

INTERIM AND EARLY ACTIONS

PROBLEM

- Pipeline funding not sufficient to address Regional demands
- Results in long RI/FS and RD durations
- Consequently remedial actions implemented long after site activities begin

SOLUTIONS?

- Encourage action prior to or concurrent with RI/FS activities

PURPOSE

- Remediate sites in Phases – emphasis on worst first
- Eliminate, reduce, or control actual or potential risks and hazards
- Expedite Site cleanup completion
- Promotes prompt risk reduction and increase site response efficiency
- Address releases or threatened releases of hazardous substances that may present risk

- Federal Register, Volume 55 No. 46, page 8704, March 8, 1990
- National Oil and Hazardous Substances National Contingency Program (NCP) [(see 40 CFR 300.415 (b)(1)(3) and 300.430 (a)(1)(ii)(A)].
- Record of Decision guidance, July 1999

REQUIREMENTS FOR DECISION

MINIMUM

- Basis For Action
 - Risk Exposure (Human health and/or Ecological) or
 - Principal Threat Wastes/Source Materials, or
 - Threat of migration and/or Release
- Interim Objectives
- Sufficient Supporting Data
- Minimum of No Action and one evaluated alternative
- Consistency with final remedial action
- Community Participation

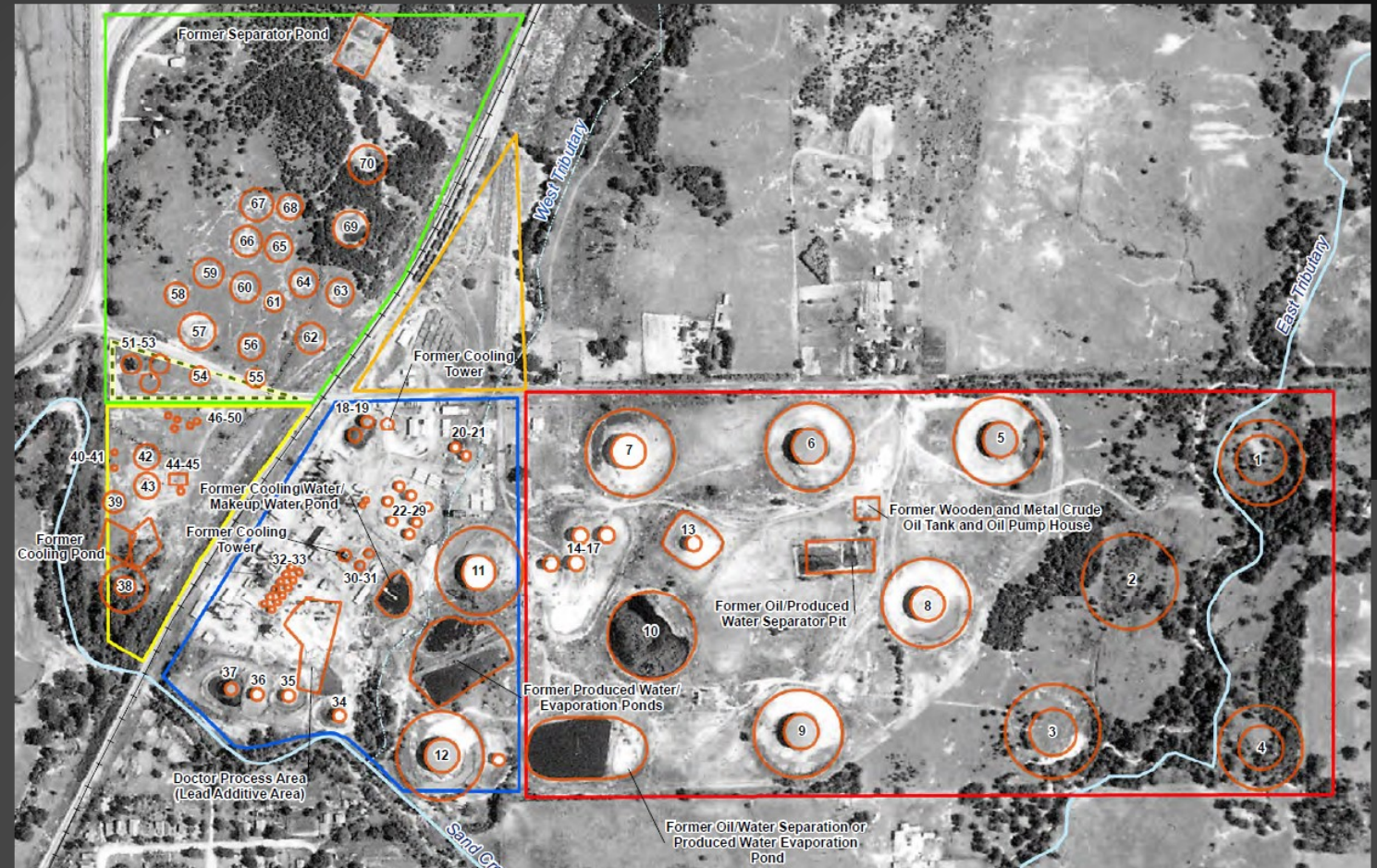
NOT REQUIRED

- Complete Site characterization
- Complete Risk Assessments
- Complete/Comprehensive Alternative Evaluation
- Extensive ROD review

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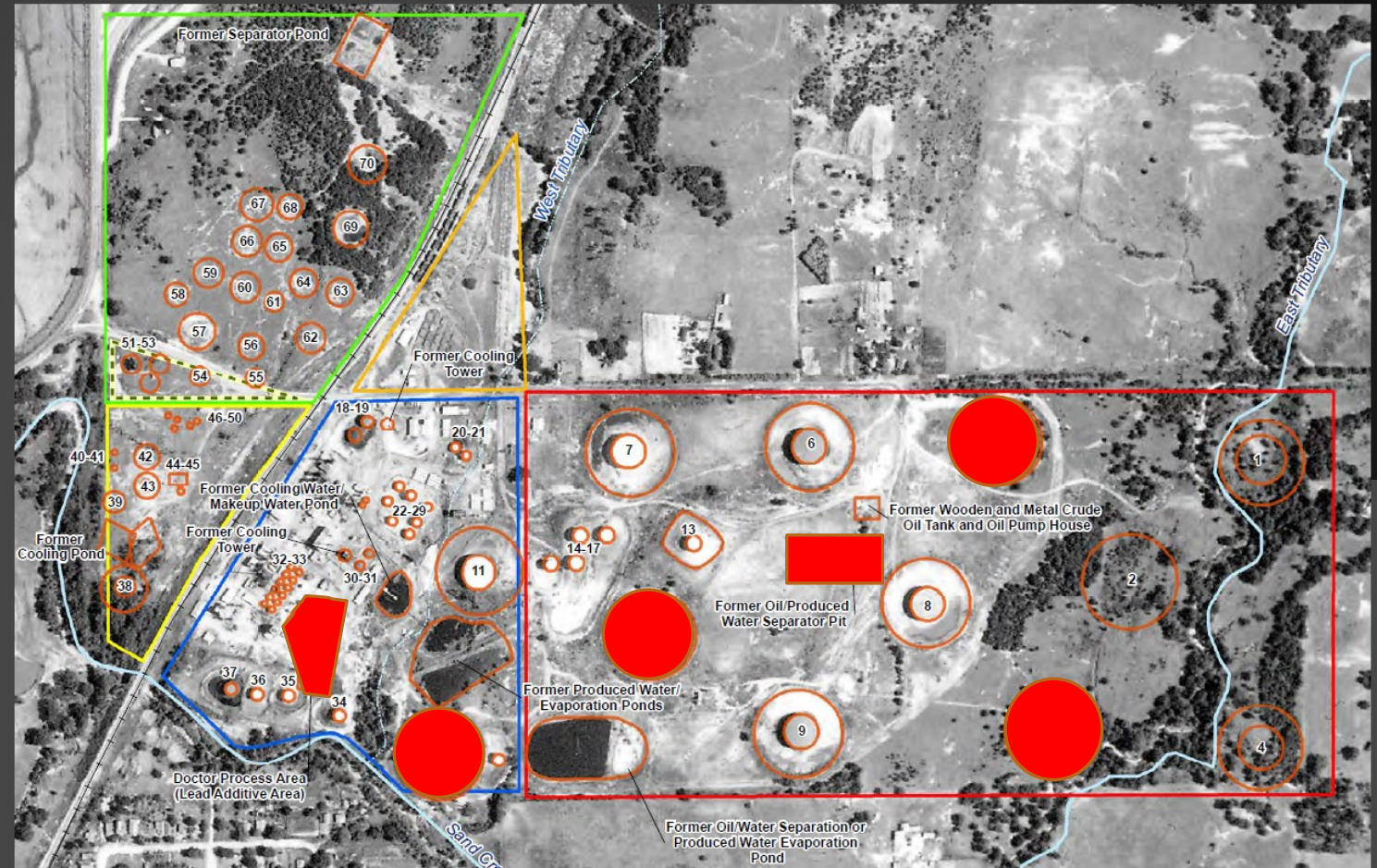
EXAMPLE: WILCOX OIL REFINERY

- Oil Refinery
- Residential Property
- Principal Threat Waste
 - Toxic, mobile, potential migration, potential vapor intrusion
- Sources: Sludge Pits and Lead Area



EXAMPLE: WILCOX OIL REFINERY

- 6 Sources/principal threats removed
- 3 Pathways to the Creek eliminated
- 4 Residential Property exposure Pathways eliminated
- Risk Reduction: Human and Ecological
- Consistent with Site Strategy
- Potential for 80 of the 150 acres to be cleanup complete
- Cost: \$1.3M - \$7M



EXAMPLE: EVR-WOOD TREATING

- Wood Treater/Refinery
- Industrial/Recreational Property
- Principal Threat Waste
 - Toxic, mobile, potential migration
- Sources: AST, UST, OWS, Pits
 - Pits – yellow
 - AST, UST, OWS - red



EXAMPLE: EVR-WOOD TREATING

- 8 Sources/principal threats removed
- Direct exposure pathways eliminated
- Risk Reduction: Human Health and Ecological
- Consistent with Site Strategy
- Cost: \$500K-\$750K

